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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

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DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

November 23, 1981

Dear Permittee:

A review of our records indicates that you are currently in possession of a valid discharge permit issued by the Water Resources Commission. That permit requires that you monitor your activities for select parameters and submit the results to the Department of Natural Resources monthly. This submission is required via monthly operating reports supplied by the State. In an attempt to be more responsive to the needs of the citizenry of Michigan, the DNR established a Regulatory Priorities Task Force to review the environmental programs administered by the department. As a result of that task force's efforts, the Department is proposing many reforms in our current program. One of these deals with submission of monthly operating reports.

At its September 17, 1981 meeting, the Water Resources Commission supported the attached recommendation of staff to reduce monitoring. If you believe your facility qualifies for reduced monitoring, please notify us immediately. Your request must be in writing and contain justification as to how you qualify in accordance with the attached recommendation. Upon receipt, staff will evaluate your request and, if appropriate, recommend to the Water Resources Commission that your discharge permit be modified.

Until your permit is modified, by the Water Resources Commission, you are still required to comply with the existing terms and conditions of your discharge permit. Please submit your request for permit modifications to Karl Zollner, Chief, Permit Section, Water Quality Division, DNR, Box 30028, Lansing, Michigan 48909. Telephone (517) 373-8008.

Thank you for your prompt response to this request. If you have any questions, please feel free to call Mr. Zollner or myself at (517) 373-8448.

Very truly yours,

WATER QUALITY DIVISION

A handwritten signature in dark ink, appearing to read "Frank Baldwin".

Frank Baldwin, Chief
Compliance Section

FB/ej

cc: B. Courchaine
W. Denniston
Section Chiefs

Regulatory Priorities Task Force Recommendation No. 18

Monthly operating reports are currently required of all water dischargers. Many of these monthly submittals, which do involve considerable expense by industry, are given little or no review by Bureau staff, especially for insignificant sources such as non-contact cooling water dischargers. Therefore, it is recommended that monthly operating reports be required only of significant sources. Minimal or insignificant dischargers would report discharge information on annual or semi-annual reports or on the annual surveillance fee form.

Staff Position

1. Act 245, P.A. 1929 and Part 21 Rules of the Water Resources Commission allow for submittals of monitoring data at intervals greater than monthly. Therefore, no rule change would be necessary.
2. The Consolidated Permit Regulations promulgated under Public Law 95-217 allow for the submission of discharge monitoring reports and monitoring frequency for select discharges of up to one year. Therefore, we do not appear to be in conflict with Federal requirements.
3. All facilities designated as major dischargers under the NPDES permit program will still be required to submit MOR's on a monthly basis.
4. All other permitted dischargers will be required to submit their monitoring data on MOR forms. However, the monitoring and submission frequencies may be semi-annual.

For purposes of implementing this recommendation an insignificant source that would qualify for reduced monitoring and submission requirements is:

- A. Any facility which has, strictly, a non-contact cooling water discharge (e.g., there is no additive, there is not a process water discharge via sewer, surface water or ground water);
- B. Any subsurface disposal facility with a discharge of sanitary sewage with a flow of 10,000 gallons per day or less;
- C. Any permitted facility with a restricted discharge period (i.e., waste stabilization lagoon with semi-annual discharge).

Implementation

With the Commission's concurrence staff would recommend the following approach for implementation:

Implementation (continued)

1. Monthly Operating Reports for the next calendar year are scheduled to be mailed to all permittees in November. In this mailing package, each permittee will receive notice of the recommendation and the Commission's proposal for reducing monitoring requirements. Each permittee, that believes it qualifies for reduced monitoring will be requested to submit an application update with justification as to how they qualify.
2. Upon review and verification of the application update, staff will present one page permit modifications to the Commission at subsequent meetings.
3. In conjunction with the above approach, staff will evaluate all new uses and applications for permit reissuance on a continuing basis to determine applicability of reduced monitoring requirements.